



VOTE SOLAR

July 27, 2020

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

Re: South Carolina Energy Freedom Act (H.3659) Proceeding Initiated Pursuant to S.C. Code Ann. Section 58-40-20(C): Generic Docket to (1) Investigate and Determine the Costs and Benefits of the Current Net Energy Metering Program and (2) Establish a Methodology for Calculating the Value of the Energy Produced by Customer-Generators
Docket No. 2019-182-E

Dear Ms. Boyd:

Pursuant to Directive Order 2020-487, Vote Solar appreciates the opportunity to submit comments on the procedural schedule proposed by motion at the July 15, 2020 Commission business meeting.¹ Vote Solar originally proposed a procedural schedule in its July 3, 2019 comments in Docket No. 2019-176-E ("Initial Comments"), which called for, among other things, a collaborative stakeholder process ahead of the formal docket. Vote Solar has been very encouraged by the collaborative spirit of these stakeholder meetings and the constructive conversations it facilitated among participants. Vote Solar remains committed to working with all stakeholders to find areas of agreement in order to make the upcoming proceeding as efficient and collaborative as possible.

In our Initial Comments, Vote Solar suggested that the Commission may wish to conduct all aspects of implementing amended § 58-40-20 within this single, generic proceeding. Based on conversations with parties and in light of current circumstances, Vote Solar retracts this recommendation. Vote Solar instead now supports the procedural

¹ Vote Solar has consulted with authorized representatives of the North Carolina Sustainable Energy Association, Sunrun, Solar Energy Industries Association ("SEIA"), and counsel for SC Coastal Conservation League, Upstate Forever, and Southern Alliance for Clean Energy. These organizations have authorized Vote Solar to represent their support for Vote Solar's comments. SEIA has indicated that they intend to petition for intervention within the timeframe established by the Commission.

approach put forward today by Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”). Vote Solar agrees that it is reasonable for DEC and DEP to file all cost-benefit and methodological information concurrently with its solar choice metering tariff proposals, as those proposals must be contemporaneously evaluated relative to the costs and benefits of the net metering program. Vote Solar further supports the recommendation that bundling these filings across the generic and respective utility-specific dockets (Docket Nos. 2019-169-E, and 2019-170) would be the most efficient and streamlined means for the Commission to consider the overlapping generic and utility-specific issues in the case. Moreover, the DEC and DEP proposal reasonably accommodates DEC and DEP’s need to have adequate time for billing system modifications to comply with a final order approving a solar choice metering tariff.

Vote Solar understands that Dominion Energy South Carolina (“DESC”) requires less time to adapt its billing system to comply with a final order. DESC’s letter suggest a preference to pursue its solar choice metering tariff on a later timeline than proposed by DEC and DEP. Consistent with DESC’s proposal, Vote Solar supports at least a four-week buffer between the procedural dates set for DEC/DEP and DESC. Vote Solar has already begun extensive discovery with DEC and DEP in order to prepare the various cost-benefit analyses required by Act 62 for DEC and DEP service territories. Vote Solar proceeded with discovery early on DEC and DEP—ahead of propounding any discovery to DESC—based on information shared at the stakeholder meetings that DEC and DEP would likely file a month or two before DESC. Vote Solar and other intervenors would likely face significant challenges in completing necessary discovery and analyses for DESC if required to do so according to the DEC and DEP proposed dates.

Vote Solar acknowledges, however, that the Commission may find it more efficient to address any generic docket methodological issues for DESC at the same time it considers these issues for DEC and DEP. If the Commission finds that it is necessary to hear simultaneously from all parties in the generic docket on more than just methodological issues, however, Vote Solar recommends pushing back the DEC and DEP timeline by a minimum of three weeks to allow intervenors additional time to complete the analyses required by Act 62 for all three utilities.

Vote Solar recommends that the Commission hold a scheduling and scoping conference to help address and define exactly what information must be provided by all parties in the generic docket, while allowing flexibility for DEC, DEP, and DESC to make staggered filings for their respective solar choice metering proposals.

Sincerely,

/s/ Thadeus B. Culley

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